

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	Crim. No. 04-10384-PBS
)	
DANIEL KAMEN)	

JOINT MOTION TO CONTINUE TRIAL

The United States, by United States Attorney Michael J. Sullivan and Assistant United States Attorney Leah Foley, along with counsel for defendant, Charles Rankin, move this Court to continue the trial date in this case from June 23, 2008 to either September 15, or 22, 2008.

Both the undersigned Assistant and defense counsel have plans to be out of the country on June 23, 2008. The defense expert witness is available to testify on either September 18, or 25, 2008. Thus, the parties respectfully request this Court to continue the trial until September 15, or September 22, 2008. Furthermore, the parties request that the time until the next trial date be excluded from the time within which defendant must be tried per 18 U.S.C. §3161(h)(3)(A) & (h)(8)(A).

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Leah Foley
Leah Foley
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I, Leah B. Foley, Assistant U.S. Attorney, certify that I caused a copy of the foregoing to be served by electronic notice to Charles Rankin, counsel to defendant.

/s/ Leah Foley
Leah Foley
Assistant U.S. Attorney